

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

BIG LOTS, INC., *et al.*,

Debtors.

Chapter 11

Case No. 24-11967 (JKS)

(Jointly Administered)

Related to D.I. 1151, 1152, 1154, 1193

**1903P LOAN AGENT, LLC’S OBJECTION AND
JOINDER TO DEBTORS’ RESPONSE WITH RESPECT TO
EMERGENCY MOTIONS TO EXTEND THE CHALLENGE DEADLINE**

1903P Loan Agent, LLC (“DIP Term Agent”), through its undersigned counsel, submits this objection to the *Emergency Motion of the Official Committee of Unsecured Creditors For an Order Further Extending the Challenge Deadline* (D.I. 1151) and *Blue Owl Capital LLC’s Second Motion to Extend Challenge Period* (D.I. 1152) and joinder to paragraphs 1 through 12 of the *Debtors’ Response to (A) Emergency Motions to Extend the Challenge Deadline, (B) Supplemental Limited Objection of the Official Committee of Unsecured Creditors to Proposed Sale of Substantially All of the Debtors’ Assets, and (C) Motion of the Official Committee of Unsecured Creditors to Shorten Notice and Schedule Expedited Hearing* (D.I. 1193) (“Debtors’ Response”)¹ and respectfully states as follows:

1. As well explained in the Debtors’ Response, no good cause has been shown to further extend the deadline for the Committee and Blue Owl to file a Challenge (at all, let alone for a 45-day period lasting into 2025). The Motions are dilatory and not based on any new facts learned in recent discovery. Instead, the Motions are a mere tactic designed to extract settlement value from the DIP Lenders, even at the expense of putting the Sale at risk.

¹ Capitalized terms used but not defined herein shall have the meanings assigned to them in the Debtors’ Response.

2. Accordingly, the DIP Term Agent hereby objects to the Motions and requests that they be denied and that the Challenge Deadline be deemed to have expired as of November 18, 2024. The DIP Term Agent expressly reserves all rights.

Dated: November 20, 2024
Wilmington, Delaware

RICHARDS, LAYTON & FINGER, P.A.

/s/ John H. Knight

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-and-

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